

CAMPBELL LITIGATION, P.C.

Stacey Campbell (*admitted pro hac vice*)

Colorado State Bar No. 38378

Email: stacey@campbell-litigation.com

1410 N. High Street, Denver, CO 80218

Telephone: (303) 517-5037

SEKI, NISHIMURA & WATASE LLP

Gilbert M. Nishimura (SBN 57905)

Email: gnishimura@snw-law.com

600 Wilshire Blvd., Ste. 1250

Los Angeles, CA 90017

Telephone: (213) 481-2869

Attorneys for Defendants

MANN ROGAL APC

Justin R. Rogal (SBN 273352)

Email: jrogal@mannrogal.com

16501 Venture Blvd., Ste. 400

Encino, California 91436

Telephone: (310) 620-2314

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

TERESA KNEEDLER,
an individual,

Plaintiff,

vs.

TRIUNITY ENGINEERING &
MANAGEMENT, INC., a Colorado
Corporation; TRIUNITY, INC., a
Colorado Corporation; JANE
DONOVAN, an individual; DOES
1-10, business entities, forms
unknown; Does 11-20, individuals;
and DOES 21-30, inclusive,

Defendants.

Case No.: 2:22-cv-08526-MCS-JC

**JOINT STIPULATION FOR
DISMISSAL WITH PREJUDICE**

Action Filed: October 31, 2022

Action Removed: November 21, 2022

Judge: Hon. Mark C. Scarsi

Trial: February 20, 2024

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), Plaintiff Teresa Kneedler (“Plaintiff”) and Defendants Triunity Engineering & Management, Inc., Triunity, Inc., and Jane Donovan (collectively “Defendants”) (collectively, the “Parties”), by and through their respective undersigned counsel, hereby stipulate that this action, including all claims filed by the Parties, shall be dismissed with prejudice and without costs, expenses, or attorneys’ fees being awarded to any Party.

Respectfully submitted.

DATED: November 20, 2023

CAMPBELL LITIGATION, P.C.

/s/ Stacey Campbell
Stacey Campbell
(admitted pro hac vice)
Colorado State Bar No. 38378
stacey@campbell-litigation.com

A.J. Peters (SBN 230182)
aj@campbell-litigation.com

**SEKI, NISHIMURA & WATASE
LLP**

Gilbert M. Nishimura (SBN 57905)
gnishimura@snw-law.com

Attorneys for Defendants

MANN ROGAL APC

/s/ Justin R. Rogal
Justin R. Rogal (SBN 273352)
jrogal@mannrogal.com

Matthew L. Mann (SBN 276220)
mmann@mannrogal.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November 2023, a copy of the foregoing **JOINT STIPULATION FOR DISMISSAL PURSUANT TO FED. R. CIV. P. 41(a)(1)(A)(ii)** has been electronically filed via CM/ECF, which will serve it upon all counsel of record in the Court's electronic filing system, including the following:

Matthew L. Mann (SBN 276220)
Justin R. Rogal (SBN 273352)
MANN ROGAL APC
16501 Venture Blvd., Ste. 400
Encino, California 91436
Telephone: (310) 620-2314
Email: mmann@mannrogal.com
jrogal@mannrogal.com

Attorneys for Plaintiff

By: /s/ Lisa Forbes
Lisa Forbes, Paralegal